IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v. **Cr. No. H-16-279**

ANGELINA GAILEY

UNOPPOSED MOTION FOR CONTINUANCE

The Defendant, Angelina Gailey moves this Court for a 120-day continuance of the motions deadline, pretrial conference and trial, and respectfully shows as follows:

Ms. Gailey is charged with one count of conspiracy, in violation of 18 U.S.C. § 1371 and one count of bankruptcy fraud, in violation of 18 U.S.C. 157(c). The pretrial motions deadline is August 15, 2016, the pretrial conference is set for September 6, 2016, and trial is set for September 12, 2016.

Discovery in this case has just started and undersigned counsel will receive the first of it next week. Undersigned counsel has identified certain legal and factual issues that require further investigation and will need more time to review due to the type of case. Undersigned counsel needs more time to complete her investigation and analysis, and then to file pretrial motions, if necessary, and to prepare for trial, if necessary. Moreover, additional time is needed to discuss the case with Ms. Gailey.

The defendant respectfully submits that the best interests of justice served by granting this motion for a continuance substantially outweigh the interests of the defendant and the community in a speedy trial, and that failure to grant the continuance would deprive defense counsel of sufficient time to prepare for trial.

The government is unopposed to this Motion for Continuance.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas No. 3233
Texas State Bar No. 14003750

By /s/ Charlotte Anne Herring
CHARLOTTE ANNE HERRING
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney Quincy Ollison and determined that the United States is unopposed to this motion for continuance.

s/ Charlotte A. Herring
CHARLOTTE A. HERRING

CERTIFICATE OF SERVICE

I certify that on July 29, 2016, a copy of the foregoing Unopposed Motion to Continue was served by Notification of Electronic Filing and was delivered by email to the office of Assistant United States Attorney Quincy Ollison at 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.

s/ Charlotte A. Herring
CHARLOTTE A. HERRING